

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**JAMES RUSSELL DAVIS**

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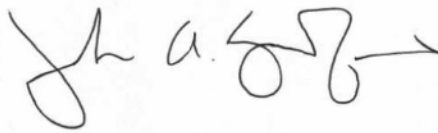
**Case No. 21-cr-595 (TJK)**

**DEFENDANT’S UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO FILE RULE 12 MOTIONS**

COMES NOW, James Russell Davis, by and through counsel, and hereby moves this Court to request an additional 1 week to file Rule 12 Motions. In support of his motion, undersigned states as follows:

1. On February 23, 2023, the Court issued a Scheduling Order [E.C.F. 36].
2. The Scheduling Order requires the defense to file any pretrial motions under Federal Rule of Criminal Procedure by April 7, 2023.
3. Due to unexpected press of other court business, undersigned counsel who is lead counsel in the case has three separate major filing deadlines this week.
4. Defense counsel has spoken with counsel for the Government, and Government counsel consented an additional one week to file motions as long as the defense consents to the same extension for the government’s response. The defense reciprocally consents.
5. Accordingly, undersigned respectfully asks the Court to amend the Scheduling Order to require Rule 12 Motions be filed by April 14, 2023, to give the government until May 5, 2023 to file responses, and the defense until May 12, 2023 to file any reply.
6. As previously stated, the government does not oppose this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. A. Scrofano". The signature is stylized and cursive, with a long horizontal stroke at the end.

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